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**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA**

STATE OF ARIZONA,

Plaintiff,

v.

ANGEL S. PAVLEVSKI (001),

KOSTADIN KOSTADINOV (002),

**MARTINA LISETTE WITTMANN,
a.k.a. MARTINA GUTTERANN (003),
and**

**ZULI J. ORDONEZ PENA,
a.k.a. JOANNA (004),**

Defendants.

Case No:

60 SGJ 97

INDICTMENT

CHARGING VIOLATIONS OF:

**COUNT 1 (001, 002, 003, 004):
FRAUDULENT SCHEMES AND
ARTIFICES**, a Class 2 Felony, in
violation of A.R.S. § 13-2310

**COUNT 2 (001, 002, 003, 004):
ILLEGALLY CONDUCTING AN
ENTERPRISE**, a Class 3 Felony, in
violation of A.R.S. § 13-2312

**COUNT 3 (001, 002, 003, 004):
ILLEGALLY CONDUCTING AN
ENTERPRISE**, a Class 3 Felony, in
violation of A.R.S. § 13-2312

**COUNT 4 (001, 002, 003, 004):
PARTICIPATING IN A CRIMINAL
SYNDICATE**, a Class 2 Felony, in
violation of A.R.S. § 13-2308

**COUNT 5 (001, 002, 003, 004):
MONEY LAUNDERING**, a Class 3
Felony, in violation of A.R.S. § 13-2317

**COUNT 6 (001, 002, 003, 004):
CONSPIRACY TO COMMIT
SMUGGLING OF HUMAN BEINGS,**
a Class 4 Felony in violation of A.R.S. §§
13-2319, 13-1003

**COUNT 7 (001, 004) :
SMUGGLING OF HUMAN BEINGS:**
a Class 4 Felony, in violation of
A.R.S. § 13-2319

**COUNT 8 (004) :
SMUGGLING OF HUMAN BEINGS:**
a Class 4 Felony, in violation of
A.R.S. § 13-2319

The Arizona State Grand Jury accuses **ANGEL S. PAVLEVSKI (001),
KOSTADIN KOSTADINOV (002), MARTINA LISETTE WITTMANN, a.k.a.
MARTINA GUTTERANN (003), and ZULI J. ORDONEZ PENA, a.k.a. JOANNA
(004)**, charging on this 14th day of March, 2007, that in or from Maricopa County,
Arizona:

COUNT 1

(FRAUDULENT SCHEMES AND ARTIFICES)

On or between January 1, 2004 and March 14, 2007, defendants **ANGEL S.
PAVLEVSKI (001), KOSTADIN KOSTADINOV (002), MARTINA LISETTE
WITTMANN, a.k.a. MARTINA GUTTERANN (003), and ZULI J. ORDONEZ
PENA, a.k.a. JOANNA (004)**, pursuant to a scheme or artifice to defraud, knowingly
obtained a benefit by means of false or fraudulent pretenses, representations, promises or
material omissions, by receiving United States Currency for the obtaining of airline
tickets for the purpose of smuggling of human beings, in violation of A.R.S. §§13-2310,

13-2301, 13-301, 13-302, 13-303, 13-304, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 2

(ILLEGALLY CONDUCTING AN ENTERPRISE)

On or between February 1, 2006 and March 14, 2007, defendants **ANGEL S. PAVLEVSKI (001), KOSTADIN KOSTADINOV (002), MARTINA LISETTE WITTMANN, a.k.a. MARTINA GUTTERANN (003), and ZULI J. ORDONEZ PENA, a.k.a. JOANNA (004)**, knowingly were employed by or associated with an enterprise and conducted such enterprise's affairs through racketeering or participated directly or indirectly in the conduct of any enterprise that the person knew was being conducted through racketeering, to-wit, Martili International, and/or Kento International, Inc. and/or Apricus Travel/Centravel, in violation of A.R.S. §§13-2312, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

The racketeering included smuggling of human beings, participating in a criminal syndicate, fraudulent schemes and artifices and money laundering, as more particularly described in the other counts of this Indictment, which the Grand Jury hereby alleges and incorporates by reference.

COUNT 3

(ILLEGALLY CONDUCTING AN ENTERPRISE)

On or between January 1, 2004 and February 28, 2006, defendants **ANGEL S. PAVLEVSKI (001), KOSTADIN KOSTADINOV (002), MARTINA LISETTE WITTMANN, a.k.a. MARTINA GUTTERANN (003), and ZULI J. ORDONEZ PENA, a.k.a. JOANNA (004)**, knowingly were employed by or associated with an enterprise and conducted such enterprise's affairs through racketeering or participated directly or indirectly in the conduct of any enterprise that the person knew was being conducted through racketeering, to wit, Apricus Travel/Iberoamericana Travel, in violation of A.R.S. §§13-2312, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

The racketeering included smuggling of human beings, participating in a criminal syndicate, fraudulent schemes and artifices and money laundering, as more particularly described in the other counts of this Indictment, which the Grand Jury hereby alleges and incorporates by reference.

COUNT 4

(PARTICIPATING IN A CRIMINAL SYNDICATE)

On or between January 1, 2004 and March 14, 2007, defendants **ANGEL S. PAVLEVSKI (001), KOSTADIN KOSTADINOV (002), MARTINA LISETTE WITTMANN, a.k.a. MARTINA GUTTERANN (003), and ZULI J. ORDONEZ PENA, a.k.a. JOANNA (004)** participated in a criminal syndicate by intentionally organizing, managing, directing, supervising or financing a criminal syndicate with the

intent to promote or further the criminal objectives of the syndicate, including but not limited to fraudulent schemes and artifices, illegally conducting an enterprise, money laundering and/or smuggling of human beings, in violation of A.R.S. §§ 13-2308, 13-2301, 13-301, 13-302, 13-303, 13-304, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 5

(MONEY LAUNDERING)

On or between January 1, 2004 and March 14, 2007, defendants **ANGEL S. PAVLEVSKI (001), KOSTADIN KOSTADINOV (002), MARTINA LISETTE WITTMANN, a.k.a. MARTINA GUTTERANN (003), and ZULI J. ORDONEZ PENA, a.k.a. JOANNA (004)** acquired, maintained an interest in, transacted, transferred, transported, received or concealed the existence or nature of racketeering proceeds knowing or having reason to know that they were the proceeds of an offense, in violation of A.R.S. §§13-2317 (B)(1), 13-2301, 13-301, 13-302, 13-303, 13-304, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

The racketeering included smuggling of human beings, participating in a criminal syndicate, fraudulent schemes and artifices and illegally conducting an enterprise, as more particularly described in the other counts of this Indictment, which the Grand Jury hereby alleges and incorporated by reference.

COUNT 6

(CONSPIRACY TO COMMIT SMUGGLING OF HUMAN BEINGS)

On or between January 1, 2004 and March 14, 2007, defendants **ANGEL S. PAVLEVSKI (001), KOSTADIN KOSTADINOV (002), MARTINA LISETTE WITTMANN, a.k.a. MARTINA GUTTERANN (003), and ZULI J. ORDONEZ PENA, a.k.a. JOANNA (004)**, with the intent to promote or aid the commission of smuggling of human beings by engaging in the transportation or procurement of transportation of persons they knew or had reason to know were not United States citizens, permanent resident aliens or persons otherwise lawfully in this state, and did so for profit, agreed with each other or another person or persons to engage in conduct constituting the offense of smuggling in human beings, and one or more of the parties committed an overt act in furtherance of such offense. Such overt act or acts included, but are not limited to, the receipt of United States currency for the purpose of smuggling of human beings, the procurement of transportation for the purpose of smuggling of human beings, the smuggling of human beings, and/or the housing of human beings for the purpose of smuggling of human beings, in violation of A.R.S. §§13-2319, 13-2301, 13-1003, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 7

(SMUGGLING OF HUMAN BEINGS)

On or about January 31, 2007, defendants **ANGEL S. PAVLEVSKI (001)** and **ZULI J. ORDONEZ PENA, a.k.a. JOANNA (004)** intentionally engaged in the transportation or procurement of transportation of persons they knew or had reason to know were not United States citizens, permanent resident aliens or persons otherwise lawfully in this state, and did so for profit, in violation of A.R.S. §§13-2319, 13-2301, 13-301, 13-302, 13-303, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

COUNT 8

(SMUGGLING OF HUMAN BEINGS)

On or about February 6, 2007, defendant **ZULI J. ORDONEZ PENA, a.k.a. JOANNA (004)** intentionally engaged in the transportation or procurement of transportation of persons she knew or had reason to know were not United States citizens, permanent resident aliens or persons otherwise lawfully in this state, and did so for profit, in violation of A.R.S. §§13-2319, 13-2301, 13-301, 13-302, 13-303, 13-610, 13-701, 13-702, 13-702.01 and 13-801.

Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described above were committed in Maricopa County, Arizona.

(A "True Bill")

TERRY GODDARD
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: _____

THEODORE CAMPAGNOLO
Assistant Attorney General

Foreperson of the State Grand Jury